
**SAN FRANCISCO ELECTRIC
RELIABILITY PROJECT
(04-AFC-1)**

DATA RESPONSE, SET 3A
(Responses to Data Requests: 161-193)

Submitted by
CITY AND COUNTY OF SAN FRANCISCO

June 3, 2005

04-AFC-1

CALIF ENERGY COMMISSION

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Sacramento, California 95833-2937

**San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
Supplement A Data Response, Set 3A**

Technical Area: Cultural Resources

CEC Authors: Beverly E. Bastian and Gary Reinoehl

SFERP Author: Doug Davy and Lori Durio

BACKGROUND

Section 8.3.3.6.1 of Supplement A summarizes the results of an archaeological field survey of the new project plant site, transmission alignment, natural gas pipeline route, and water supply pipelines (process and potable) conducted on February 21, 2005. No individual report of this survey has been provided with this application.

DATA REQUEST

161. Please provide a technical report in Archaeological Resource Management Reports (ARMR) format documenting the February 21, 2005 archaeological survey (methodology, transect intervals, ground visibility, etc.) prepared by an individual that meets the U.S. Secretary of the Interior's Professional Standards. Please append a copy of the record search (NWIC 04-687) to the technical report. If the ARMAR identifies any site locations the report should be submitted under confidential cover.

Response: The Archaeological Resource Management Report is attached to this submittal as Attachment CR-161. It is not necessary to file this report under confidential cover because it does not contain confidential site records. The Applicant previously submitted the record search report (NWIC 03-548) prepared by the California Historical Resources Information Center Northwest Information Center under confidential cover (see AFC Confidential Appendix 8.3D). A qualified archaeologist, Dr. Douglas Davy, visited the Northwest Information Center to inspect the archaeological and historic site records to determine whether or not sites have been recorded near the project site or linear facilities since the previous records search. This record search update determined that there are no newly recorded sites within or near the Area of Potential Effects. There is no written record search report of this update other than the Application for Certification and Archaeological Resource Management Report provided in response to this data request.

BACKGROUND

Section 8.3.3.6.7 of Supplement A contains a discussion of the efforts made by the previous applicant, SECAL/Mirant, and the cultural resources firm, CH2M HILL, to initiate Native American consultation on an earlier power plant project, located two blocks north of the present project proposed by the City and County of San Francisco (CCSF). From this discussion, it is clear that the CCSF has not consulted with Native Americans about possible impacts to resources of concern to them in the new location of the proposed power plant.

In December, 2003, the Native American Heritage Commission (NAHC) provided CCSF with a list of Native American contacts with historic ties to the project area. In that letter, the NAHC advised: "If a response has not been received within two weeks of

San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
Supplement A Data Response, Set 3A

notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received." Native American contact efforts by CCSF for the previous proposed plant site are outlined in Supplement A, Section 8.3.3.6.7. The discussion provides no indication that the officially requested follow-up telephone contacts were carried out.

DATA REQUEST

162. Please contact the NAHC, request a current list of the names, addresses, and telephone numbers of Native Americans having historic ties to the project area, and send a letter and map indicating the new project area, with the request that they notify your Cultural Resources consultant if they know of any cultural resources that could be affected by the revised project. Please provide Energy Commission staff with copies of the letters to the Native Americans on the NAHC list and copies of any written responses received from Native Americans.

Response: The Applicant has contacted the Native American Heritage Commission and requested a search of the Sacred Lands File and a list of Native American consultants. NAHC's response is provided as Appendix B of Attachment CR-161. Copies of the letters sent to the NAHC list are also provided in Appendix B of Attachment CR-161.

163. If responses from Native Americans are not received in the time allowed, please make follow-up telephone calls and provide Energy Commission staff with copies of either letters from the NAHC responding to your request(s) or telephone logs of the calls, evidencing that the notification was made and documenting any other information provided by Native Americans.

Response: See Data Response #162.

BACKGROUND

In the Supplement A, the applicant did not provide a map or written description of the Impact Area (IA) of the project. Staff needs to determine if impacts from the construction of the linear facilities will extend beyond their proposed footprints.

DATA REQUEST

164. For the trenches of the transmission alignment (two alternate routes), the natural gas pipeline route, and the water supply pipelines (process and potable (two alternate routes)), please provide a discussion of:

a) the width and maximum depth of the trenches;

Response: Trench widths and depths will vary depending on soil conditions and any obstructions that may be encountered. In general, in areas with sound soil conditions and no obstructions, trenches will be 2 to 3 feet wide and about 5 feet deep. It is expected that the HV transmission duct bank will have a slightly larger trench, 5 feet wide and 7 feet deep. In areas where soil is unstable, shoring may be used to keep trench walls vertical. However, in such cases trenches may be as much as 5 to 6 feet wide or wider

San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
Supplement A Data Response, Set 3A

depending on the design requirements of the shoring. If obstructions (such as existing utilities) or poor soil conditions are encountered, trenches may need to be excavated deeper to allow new utility lines to be routed beneath the obstructions or to improve soil conditions. The depth of any additional excavation that may be required is unknown at this time.

b) the width of the construction area to either side of the trenches;

Response: The construction area for utilities will be about 12 feet wide where open-trench construction is used. The area will include space for stockpiling excavated material on one side of the trench, the trench, and space for equipment and trucks on the other side of the trench.

c) the location and size in all three dimensions of the starting and ending pits for the jack-and-bore segments of the trenches including the description of the construction area around the pit;

Response: The precise locations of jack-and-bore construction are not known at this time. The locations will be defined during final design. However, for the recycled water line, it is likely that a trenchless construction method (such as jack and bore) will be required to cross beneath the Muni light rail at the intersection of Third Street and Cesar Chavez Street. For the HV transmission duct bank it is expected that trenchless construction will be required at the intersection of 24th Street and Illinois Street. Trenchless construction may also be required if other large obstructions are encountered. The size of the entrance pit would need to be approximately 30 feet long and 15 feet wide. Depths of pits will match depths of other trenches: +/- 5 feet if no obstructions exist.

Jack and bore does not have a receiving pit. If microtunneling is used, a receiving pit will be needed to remove the tunneling head. The dimensions of the receiving pit would be about 5 feet wide x 20 feet long x pipe trench depth (+/- 5 feet).

d) the location of areas where excavated soil will be stored before backfilling;

Response: Excavated material that is suitable for use as backfill will be stockpiled along the lengths of the trenches. The stockpiles will be approximately 5 feet wide. It is anticipated that only portions of the trenches will be open at any given time during construction; stockpiles will only be present along the open portions. Soil excavated from trenches that cross intersections and driveways will be stockpiled away from these areas to permit traffic flow as required.

e) any soil disturbing activities that will be done on areas where trench and other construction equipment will be stored and where and of what size those storage areas will be; and

Response: It is anticipated that the construction laydown area will be used to store materials and equipment used to construct offsite utilities (ref. Supplement A, Figure 1-2). Material to be stored in the laydown area will consist of sections of pipe, cable, fittings, and appurtenances. Equipment stored in the laydown area may include trenching equipment and other equipment commonly used in pipeline construction such

San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
Supplement A Data Response, Set 3A

as soil compactors. It is expected that the material and equipment will fit within the laydown area.

- f) the impact of vibrations from the construction of the trenches on the historic buildings within one block to either side of the trenches, especially along Third Street between 20th and 23rd Streets.

Response: Construction of utilities is not expected to generate significant vibrations that would affect existing structures. Any vibrations that may be generated will be equivalent to existing truck traffic.

BACKGROUND

The Supplement A indicates that the process water pipeline on Marin Street, Mississippi Street, and part of Chavez Street will be installed in existing collection boxes.

DATA REQUEST

165. Please indicate whether the entry into the existing collection boxes will disturb the earth around the boxes, and, if so, in what way and to what extent.

Response: Entry into the existing box structures will be through existing manways. Access may require foot traffic and some equipment traffic in the immediate vicinity of the manways. However, no excavations around the box structures specifically intended to provide access are anticipated.

BACKGROUND

Review of multiple sections of the SFERP Supplement A (pp. 1-2; 1-6; 2-1; 7-1; 8.11-12; 8.14-14) reveals that the specifications for the process water pumping station to be located on Marin Street are not clearly set out.

DATA REQUEST

166. Please indicate whether the process water pumping station is new construction or re-use of an existing structure.

Response: The water pumping station will be new construction.

167. If the process water pumping station would re-use an existing structure, please indicate if the structure to be re-used meets the criteria for eligibility to the California Register for Historic Resources (CRHR), and, if so, what impacts the re-use will have on the structure.

Response: The water pumping station will be new construction.

168. If the process water pumping station would re-use an existing structure, please indicate how much ground disturbance the adaptation will cause both vertically and horizontally.

Response: Not applicable.

**San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
Supplement A Data Response, Set 3A**

169. If the process water pumping station would require construction of a new structure, please indicate how large the new structure is, whether it is above or below ground, and how much ground disturbance the construction will cause both vertically and horizontally.

Response: The pump station will be primarily constructed below ground, but small electrical power supply and control panels will be constructed above ground. The electrical power and control panels may be located in an enclosure to protect them from vandalism and weather damage. The wet well of the pump station (the below-ground portion of the pump station) will be approximately 24 feet by 12 feet in plan and approximately 20 feet deep. The excavation required to construct the pump station will extend approximately 5 feet beyond the pump station walls on each side. Shoring will be required to hold the walls of the excavation. Additional trenching for piping and electrical wiring will be required in the immediate vicinity of the pump station.

BACKGROUND

The Supplement A does not assess the impact of the change in setting which the proposed project will impose on two historic sugar warehouses.

DATA REQUEST

170. Please provide a description of the change in setting and feeling to the two historic sugar warehouses located on the south side of 23rd Street, east of Michigan Street that would occur because of the construction of the project and assess the impact to the two warehouses.

Response: The two former sugar warehouses on 23rd Street are the only remaining buildings of the California Sugar Refinery, which was constructed in 1881 by San Francisco industrialist Claus Spreckels. The California & Hawaiian Sugar Refining Corporation purchased the property in 1949 and demolished the plant and most of the buildings in 1951. According to the San Francisco Planning Department's (2001) Central Waterfront Cultural Resources survey, DPR-523 building record form, the buildings were constructed in 1923 and 1929, respectively, as part of a facility expansion. They were used for final preparation and packaging of sugar products. Their reinforced concrete construction represented an advance over the use of wooden or brick buildings for sugar processing and storage because it was easier, in these buildings, to keep the sugar dry. This City report recommends that these properties be evaluated as contributors to a potential Pier 70 historic district or as individual historic resources and that they are eligible for listing in the National Register under Criterion A at the local level of significance. The DPR-523 building record indicates that these two buildings are "little altered and possess integrity of location, design workmanship, materials, and association." It also states that "by the loss of the rest of the plant, there is a substantial loss of integrity of setting and feeling."

Construction of the SFERP will change the setting of these two buildings by introducing a new element to the general surroundings. The SFERP is approximately 700 feet from the warehouses at the nearest point. Large buildings are located between the

San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
Supplement A Data Response, Set 3A

warehouses and the SFERP that block views of the lower portion of the SFERP from most of the area near the warehouses. From the warehouses, the stacks, combustion turbine air intakes, and SCR housing may be visible above the roof lines of the intervening buildings. At the extreme western end of the westernmost warehouse, however, there would be a more direct line of sight to the SFERP, across the open water that is directly south of the westernmost warehouse and northeast of the SFERP.

This change in setting that the SFERP causes would be modest, however, and would not significantly damage the integrity of setting, feeling, and association of these buildings. All of the other buildings associated with the sugar refinery on Potrero Point have been demolished, so a great deal of their historical integrity of setting has been removed, as the DPR-523 form notes. As stated above, these properties are significant because of their integrity of location, design, workmanship, and association, but not because of their integrity of setting or feeling, which has been significantly diminished by the removal of the remainder of the sugar refinery buildings.

Although older industrial buildings are located near the warehouses on the southeast, west, and northwest, the design of the SFERP, with its warehouse-like control building and other industrial equipment, is not out of keeping with the heavy industrial character of the area in general. Neither does power generation equipment add a new industrial element to this area, considering that the Potrero Power Plant is immediately adjacent to (north of) the westernmost sugar warehouse. This is a structure several stories high with a massive exhaust stack more than 200 feet high. It would, therefore, be fair to say that the SFERP is in keeping with the industrial setting of the warehouses and that its effect on them and their significance and integrity would be negligible.

BACKGROUND

In Data Responses Set 1A, provided by SFERP, the response to Data Request 23, provided a District Record (DPR 523) for a proposed Central Waterfront Historic District. The boundaries for the district are described as 16th Street to the north, Interstate 280 to the west, Islais Creek to the south, and San Francisco Bay to the east. The supplementary application describes the project site and most of the linear facilities as being within the district.

DATA REQUEST

171. Please provide a discussion of the character-defining features of the district and the impacts of the project to the proposed Central Waterfront Historic District by an individual who meets the U.S. Secretary of the Interior's Professional Standards for history or architectural history. Please ensure that the discussion includes changes in the attributes of integrity, and address whether the impacts would materially impair the eligibility of the proposed district.

Response: The Central Waterfront District is significant as an area within which there are a number well-preserved industrial buildings that reflect and embody the history of heavy industrial development in San Francisco. The district was largely undamaged in the 1906 earthquake, so it has preserved many types of older industrial buildings that

San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
Supplement A Data Response, Set 3A

were damaged or destroyed elsewhere. Heavy industry is the most important character-defining theme of the Central Waterfront District. The Dogpatch residential neighborhood, which is "significant as the oldest and most intact surviving concentration of Victorian-era industrial workers housing in San Francisco" (City of San Francisco Planning Department 2001) provides an important secondary theme. Early industries that have defined the character of the district, including many that have a maritime association, have included the DuPont gunpowder manufacturing plant, Tubbs Cordage rope-making facility, Pacific Rolling Mills and associated shipyards, Union Iron Works, Bethlehem Steel, American Can Company, American Barrel, the California/Western Sugar Refinery, and San Francisco Gas & Electric Company. During the 1930s, Third Street was widened, and many of the buildings along this street were remodeled to incorporate Art Deco facades, many of which are well-preserved.

There are three important sub-districts within the Central Waterfront District: 1) Pier 70 Area at the north end, 2) Dogpatch residential area to the west, and 3) PG&E Area in the central portion of the district. The Pier 70 Area contains the largest number of buildings with good historic integrity and much of this area was associated with iron-working and shipbuilding industries. Dogpatch, as mentioned above, was a residential area for many of the Central Waterfront District's workers. The PG&E area contains the remnants of one of the City's largest early power plants. In 1901, San Francisco industrialist and owner of the California Sugar Refinery Claus Spreckels formed the Independent Electric Power & Light Company to build the Potrero Steam Plant (later called Station A) partly because of a disagreement with the president of San Francisco Gas & Electric Company, Joseph B. Crockett. The plant came into PG&E ownership 4 years later.

The SFERP would have a negligible effect on the integrity of the Central Waterfront District. It is located south of the PG&E Area, in a zone of relatively recent fill (since 1930) that is not near or adjacent to any of the buildings or structures identified as historic properties in the Central Waterfront study. The project will add a heavy industrial element to the project area, but this is entirely in keeping with the character of the district.

Power generation, in fact, has been an important industrial use in the Central District's PG&E Area, approximately 800 feet north of the SFERP site, as noted above. Several of the Station A buildings remain at Potrero Point, and PG&E has constructed the very large Potrero Power Plant at the western end of Potrero Point, north of the SFERP.

The SFERP would not be visible, or would be barely visible, from areas within the Central Waterfront District that retain the most historic integrity, such as Pier 70, Dogpatch, and the PG&E Area. No other effects on the Central Waterfront District are anticipated from the SFERP project.

BACKGROUND

The supplemental application states that a site history report to describe past uses of the site will be prepared (p. 8.9-12).

San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
Supplement A Data Response, Set 3A

DATA REQUEST

172. Please provide a copy of any site history report prepared for this project.

Response: The site history report referred to in Section 8.9 of Supplement A is provided in Section 2.2 of the Site Characterization/Corrective Measure Study and Article 22A Soil Characterization Report that is being provided as Attachment WM-184.

BACKGROUND

The Supplement A states that a geotechnical boring study of the proposed site will be done (p. 10G-4). Such a study could provide information on submerged cultural resources located on the former Bay floor.

DATA REQUEST

173. If geotechnical boring has not yet been completed, please have an archaeologist, who meets the Secretary of the Interior's Professional Standards, monitor the boring and write a report, consistent with ARMR format, on any cultural materials present in the cores, descriptions of sediments, and an assessment of the potential of the project to disturb buried cultural resources. Please provide staff with a copy of that report within 30 days of completion of the boring. If it is not possible to meet that schedule, please provide staff with a projected date for submitting the report.

Response: The Applicant will monitor the geotechnical borings and provide a report of the results within 3 weeks following completion of the borings.

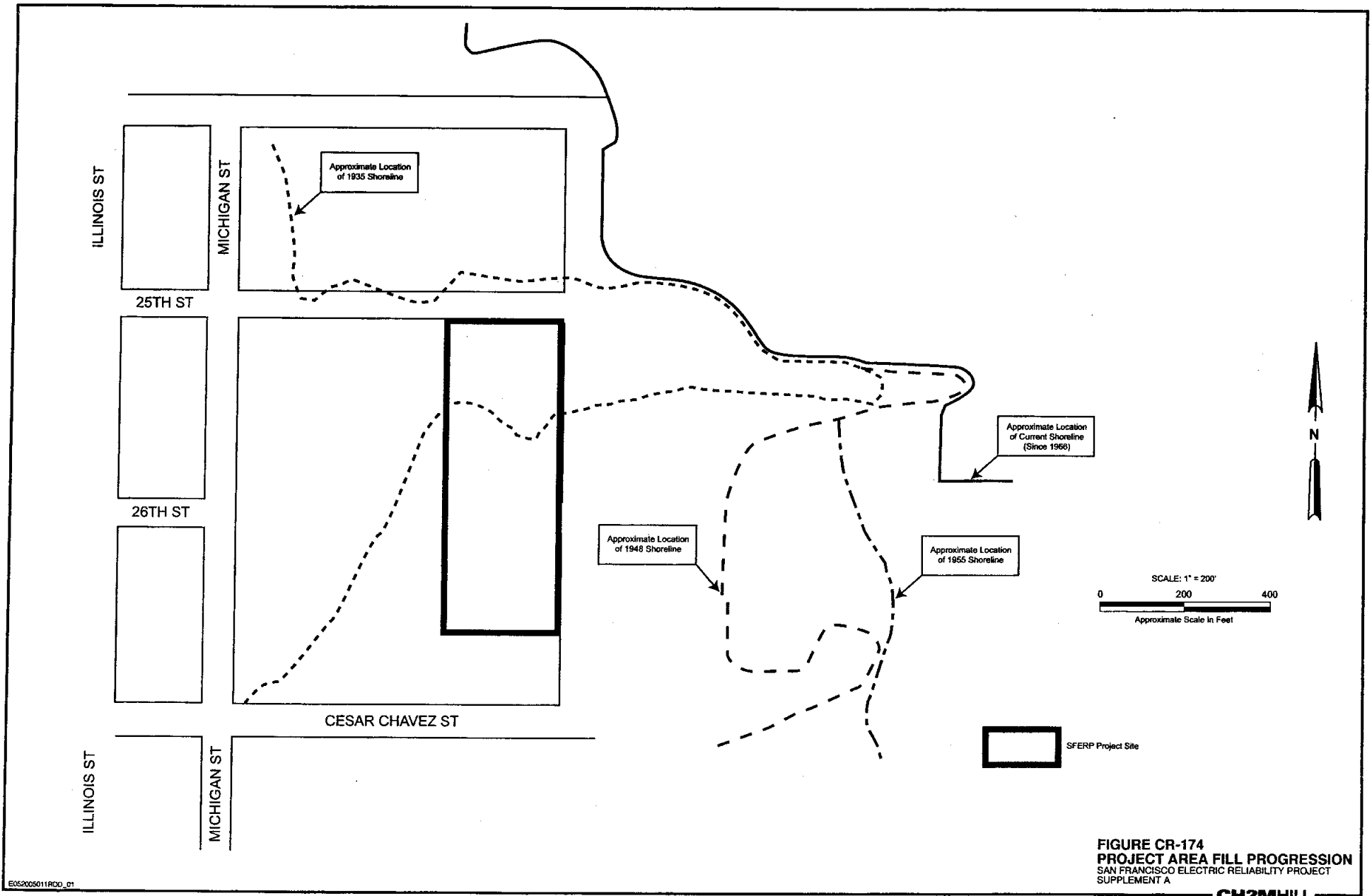
BACKGROUND

The Supplement A postpones a decision on the necessary depth of the foundations of the components of the power plant site, but describes the fill on which the plant will be built as quite variable in depth (up to 40 feet), and of a character probably requiring the use of pilings or caissons (p. 10G-4-5). Pilings or caissons could potentially impact any cultural resources buried under the fill at the proposed plant site, such as sunken vessels, lost cargoes, collapsed wharves, and buried or submerged archaeological sites. The application makes no mention of the potential for submerged historic-period resources under the fill at the plant site. More information is needed for staff to assess the potential for submerged or buried archaeological resources.

DATA REQUEST

174. Please provide a detailed discussion of the history of the nineteenth and twentieth century filling of the bay in the area bounded by old Potrero Point on the north, Mississippi Street on the west, and Islais Creek on the south, including maps depicting the progression of the filling.

Response: Figure CR-174 depicts the progressive filling of the bay in the project area (source: AGS Inc. 1999). Supplement A provides a detailed discussion of the history of



San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
Supplement A Data Response, Set 3A

nineteenth and twentieth century filling of the bay in the area bounded by Old Potrero Point, Mississippi Street, and Islais Creek. Figure 8.3-2 in that document shows the boundaries of early filling for the Third Street and Army (Cesar Chavez) Street trestles. Figure CR-178, referenced below, shows the prehistoric shoreline.

175. If the project site was underwater prior to the filling, please consult Pam Griggs (916-574-1854) with the State Lands Commission and with the San Francisco Maritime Museum to determine if there are known shipwrecks in the project site and provide a copy of maps or other information obtained by this search.

Response: The Applicant has conducted a search of the State Lands Commission's (SLC) on-line shipwrecks database. This database lists 140 shipwrecks for San Francisco County. None of these, however, are located near the project area (the wrecks are listed by latitude and longitude). Most of the listed wrecks are for the outer Pacific Coast or areas further north in San Francisco Bay. Ms. Griggs of the SLC has advised the Applicant that there is a more comprehensive shipwrecks database that is not available to the public and has agreed to conduct a search of this database. The Applicant has not yet received the results of this database search, however, and will file them with the Commission when received. The Applicant has also conducted an information search at the San Francisco National Maritime Museum Library, to determine whether or not shipwreck locations are known for the project area. This information search did not result in the identification of shipwrecks near the SFERP project site.

The literature search indicates that shipwrecks due to bad weather, faulty navigation, etc. are more likely to found along the outer Pacific Coast and along rocky shores near the Golden Gate and Alcatraz Island than in more sheltered portions of San Francisco Bay such as Islais Creek Cove. This research also indicated, however, that it was a relatively common practice to scuttle boats or ships in shallow areas of the Bay where bay filling was taking place, to help provide some sort of structural foundation for the fill (personal communication, Steven Davenport, Reference Librarian, San Francisco Maritime National Historic Park, 2005). Ships or boats were sometimes hauled to shallow water, salvaged, and then burned to the waterline. Fill would then be placed around or over them. Because this filling was generally an informal activity that did not require official authorization, however, detailed records of the locations of these vessels were not kept.

176. Using the maps cited in the Cultural Resources "References" (Section 8.3.9) and additional information on the project area gathered from the files and publications of San Francisco historical organizations, please provide a discussion of the potential for submerged or buried cultural resources under the fill at the proposed plant site.

Response: The project site is located on land that was filled between 1935 and 1948. Before that time, the project site was occupied by a shallow embayment in Islais Creek Cove. Submerged or buried resources at the project site would, therefore, likely be: 1) prehistoric shell middens or other sites representing a time period when the bay's water level was lower (pre-6,000 B.P); 2) a boat or ship wreck; or 3) refuse dumped in the bay to create fill during the filling episode (1935 to 1948). Investigations with local experts and the San Francisco National Maritime Museum have not resulted in the

San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
Supplement A Data Response, Set 3A

identification of specific resources such as known shipwrecks in the vicinity of the project site (see also Data Response #175).

177. If the archeological assessment of the geotechnical boring at the plant site and/or the requested assessment of the potential for submerged or buried cultural resources indicate the possible presence of such cultural resources, please provide a discussion of what impact the proposed pilings or caissons will have on those resources.

Response: Although the literature review indicates that there is some potential for buried resources at or near the project site, this cannot be known with certainty until some kind of material excavation takes place. Any assessment of the impacts of pile-driving would be purely hypothetical without knowing about a resource, its location, integrity, and significance. If pile driving were to avoid directly affecting such resources, there would be little or no impact. If the piles were to penetrate, for example, a shipwreck, the significance of impact would depend on the significance of the resource and possibly the location impacted. The feasibility of recovering information that would permit an assessment of significance and an assessment of pile-driving impacts would also have to be considered if a buried resource were found, given the probable depth of the fill.

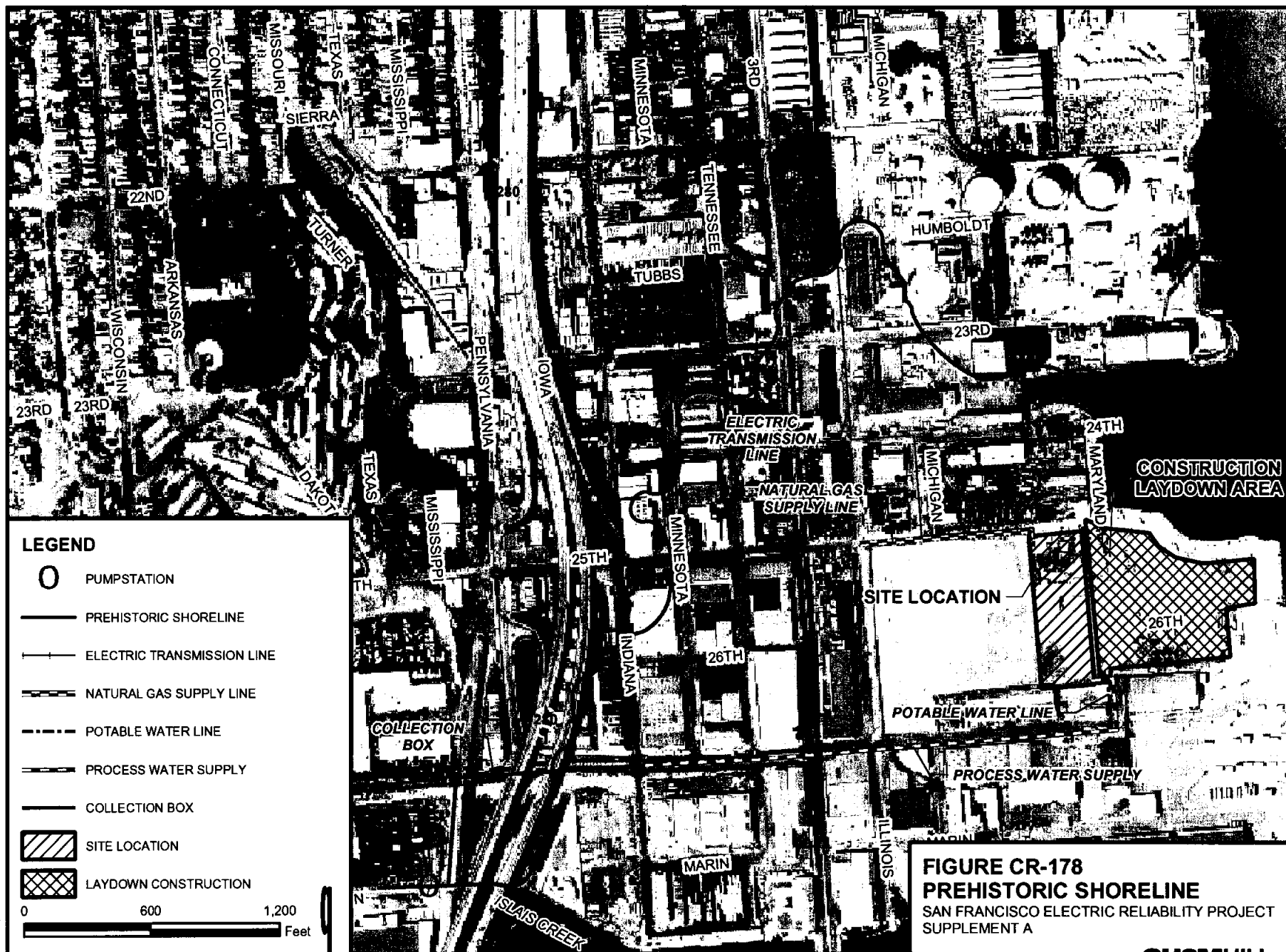
BACKGROUND

The application acknowledges the high potential for the presence of prehistoric archaeological resources on the western end of the process water pipeline route, but fails to include that area on their map of the prehistoric shoreline (Figure 8.3-2). To appropriately assess the potential for prehistoric archaeological resources at the plant site, along the process water pipeline, and at the construction site of the water pumping station, staff needs more information on the horizontal extent of the shoreline in the area of Marin, Mississippi, and Cesar Chavez Streets, and Interstate 280.

DATA REQUEST

178. Using the maps cited in the Cultural Resources "References" (Section 8.3.9) and any additional relevant sources, please provide a map delineating the earliest known shoreline in the area of Marin, Mississippi, and Cesar Chavez Streets, and Interstate 280.

Response: Figure CR-178 depicts the earliest known shoreline in the area of Marin, Mississippi, and Cesar Chavez Streets, and Interstate 280.



Attachment CR-161

**Archaeological Resources
Management Report
for the
San Francisco
Electric Reliability Project
San Francisco, California**

Prepared for:

San Francisco Public Utilities Commission
San Francisco, CA

June 3, 2005

Prepared by:



CH2MHILL

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Date: June 3, 2005

Title: Archaeological Resource Management Report, San Francisco Electric Reliability Project, San Francisco, California

Submitter: Public Utilities Commission, City and County of San Francisco

Submitted to: California Energy Commission, Sacramento, CA

CEC Docket #: 04-AFC-001

USGS Quad: San Francisco South and San Francisco North 7.5-minute quadrangles

Acreage: Project footprint = 4 acres, potential disturbance area = 4 acres
Project linears = approximately 0.6 acres of potential disturbance

Contents

Section	Page
Abstract.....	v
1.0 Project Description.....	1
1.1 Project Description.....	1
1.2 Laws, Ordinances, Regulations, and Standards.....	2
1.2.1 Federal	2
1.2.2 State	3
1.2.3 Local	7
2.0 Setting.....	13
2.1 Prehistoric Setting.....	13
2.2 Ethnographic Setting.....	13
2.3 Historic Setting	14
2.4 Potential for Buried Resources.....	17
3.0 Literature Review	25
3.1 Architectural Resources	25
3.2 Archaeological Resources	27
3.3 Native American Consultation.....	28
4.0 Field Inventory.....	29
5.0 Conclusions and Recommendations.....	31
6.0 References Cited.....	33

Figures

- Figure CR161-1. Project Location
- Figure CR161-2. Survey Area
- Figure CR161-3. Prehistoric Shoreline
- Figure CR161-4. Project Area Fill Progression

Appendices

- Appendix A. Records Search Results
- Appendix B. Native American Consultation Letters

Abstract

The City and County of San Francisco (CCSF) is proposing to construct and operate a simple-cycle power plant, the San Francisco Electric Reliability Project (SFERP), in San Francisco. The CCSF has prepared a Supplement to the Application for Certification (AFC) for the SFERP (referred to as Supplement A) for the relocation of the project site to a 4-acre site of City of San Francisco (City)-owned land, located near the San Francisco Bay in the Potrero District of San Francisco. The SFERP will consist of a nominal 145-megawatt (MW) simple-cycle plant, using three natural gas-fired, General Electric LM 6000 gas turbines and associated infrastructure.

CH2M HILL conducted a literature review and archaeological field inventory of the project site and the project linear appurtenances, including a transmission line, natural gas pipeline, process water line, and waste water pipeline. The literature search indicated that the area to the north of the project site is known as the Central Waterfront District. This area has been the subject of extensive studies for historic architectural and other historic sites. The literature search also indicated that the project site is located on land that was formerly the shallow cove of Islais Creek Cove and that was filled in successive stages between 1931 and 1966. There are no historic or archaeological properties at the site or project pipelines that the project would affect. The SFERP would also have no indirect effects on historic properties.

1.0 Project Description

1.1 Project Description

The SFERP will consist of a nominal 145-megawatt (MW) simple-cycle plant, using three natural gas-fired, General Electric LM 6000 gas turbines and associated infrastructure. The project site is located near the San Francisco Bay in the Potrero District of San Francisco, on City-owned land adjacent to the new MUNI project (Figure CR161-1 at end of section). Approximately 4 fenced acres will be required to accommodate the generation facilities. The construction laydown area will be approximately 8.5 acres and located on land leased from a City department, the Port of San Francisco (Port). The laydown area is located directly east and adjacent to the project site between 25th and Cesar Chavez streets, and the waterfront and the SFERP site (Figure CR161-2).

The project will include the construction of a new air-insulated 115-kilovolt (kV) switchyard on the north side of the site adjacent to 25th Street. The SFERP will link to the power grid through the PG&E Potrero Substation by two redundant three-phase 115-kV solid dielectric underground transmission circuits. From the SFERP switchyard to the connection at the Potrero Substation breakers, the total transmission distance is approximately 3,000 feet.

Natural gas for the facility will be delivered through a new 900-foot-long, 12-inch diameter (or less) pipeline that will connect to PG&E's existing natural gas transmission line, which is located at the intersection of Illinois and 25th streets.

Process water for the project will be delivered from a water pump station (WPS) located on Marin Street near Cesar Chavez to a new water treatment plant located on the SFERP project site. The WPS will be located near an existing combined sewer system structure and will include three variable frequency drive pumps (two operational and one standby). A 0.76-mile-long pipeline will connect the WPS and the SFERP's onsite treatment system. This pipeline consists of two sections. The first section, approximately 1,300 feet long, will be installed within an existing collection box. The remaining section will be new construction. The onsite treatment system will be designed to produce California Code of Regulations (CCR) Title 22-quality recycled water.

Plant wastewater and reject water from the SFERP's water treatment system will be discharged into the City's combined sewer system, which routes the waste to the Southeast Water Pollution Control Plant (SEWPCP).

The project site is located near the San Francisco Bay in the Potrero District of San Francisco, on a 4-acre site of City-owned land that is surrounded by industrial development. The site is zoned for industrial use. Development of a power plant in this area would be consistent with the zoning ordinance. The center of the SFERP site is located at approximately 37°47'7.50" N. latitude and 122°23'0.82" W. longitude in Township 2 S., Range 5 W. This township has never been surveyed into sections because it was part of an original Spanish land grant. All the proposed SFERP facilities will be located within either the southernmost portion of the U.S. Geological Survey (USGS) San Francisco North or the northernmost portion of the San Francisco South 7.5' (1:24,000-

scale) standard topographic maps. The site is located on Block 474 and portions of Blocks 473, 467, and 468.

The site is near PG&E's 115-kV Potrero Substation. The existing substation has sufficient transmission capacity to serve a new 145-MW plant. Natural gas would be supplied to the new power plant from the PG&E main located at the corner of Illinois and 25th streets. Additional natural gas compressors would be necessary to serve the new plant. Water supply for the proposed plant would be obtained from the City's combined sewer system via a pumping station, a pipeline, and an onsite primary, secondary, and tertiary recycled water treatment system that will produce CCR Title 22-quality recycled water. Wastewater from the plant would be returned to the City's combined sewer system.

Cultural resources include prehistoric and historic archaeological sites,¹ districts and objects; standing historic structures, buildings, districts and objects; and, locations of important historic events, or sites of traditional/cultural importance to various groups.² Primary data sources used to prepare this section include the CEC testimony by Reinoehl and Mason (2002) who incorporated the results of several documents, including: Mirant (2001a, b), SECAL (2000a-c, 2001a-d), URS/Dames & Moore (2000), and Wirth Associates (1979).

1.2 Laws, Ordinances, Regulations, and Standards

Cultural resources are indirectly protected under provisions of the federal Antiquities Act of 1906 (Title 16, United States Code, Section 431 et seq.) and subsequent related legislation, policies, and federal agency regulations and guidelines for implementation of the Antiquities Act.

The following laws, ordinances, regulations, standards, and policies apply to the protection of cultural resources in California. Projects licensed by the Energy Commission are reviewed to ensure compliance with these laws. Table 2-1 summarizes applicable LORS.

1.2.1 Federal

National Historic Preservation Act (NHPA), 16 USC 470, requires federal agencies to take into account the effects of their undertakings on historic properties through

1 Site – "The location of a significant event, a prehistoric or historic occupation or activity, or a building or structure...where the location itself possesses historic, cultural, or archeological value." (USNPS-IRD, 1991:15)

2 The federal definitions of cultural resource, historic property or historic resource, traditional use area, sacred resources are reviewed below and are typically applied to non-federal projects.

A cultural resource may be defined as a phenomenon associated with prehistory, historical events or individuals or extant cultural systems. These include archaeological sites, districts and objects; standing historic structures, districts and objects; locations of important historic events; and, places, objects and living or non-living things that are important to the practice and continuity of traditional cultures. Cultural resources may involve historic properties, traditional use areas and sacred resource areas.

Historic property or historic resource means any prehistoric district, site building, structure or object included in, or eligible for, inclusion in the National Register of Historic Places. The definition also includes artifacts, records and remains that are related to such a district, site, building, structure or object.

Traditional use area refers to an area or landscape identified by a cultural group to be necessary for the perpetuation of the traditional culture. The concept can include areas for the collection of food and non-food resources, occupation sites and ceremonial and/or sacred areas.

Sacred resources applies to traditional sites, places or objects that Native American tribes or groups, or their members, perceive as having religious significance.

consultations beginning at the early stages of project planning. This law is applicable to projects that involve federal property, permits, loans, or other direct federal involvement. Regulations revised in 2004 (36 CFR Part 800 et seq.) set forth procedures to be followed for determining eligibility for nomination, the nomination, and the listing of cultural resources in the National Register of Historic Places (NRHP). The eligibility criteria and the process are used by federal, state, and local agencies to determine significance of cultural resources. Properties that meet the criteria for listing in the NRHP are called historic properties. Very similar criteria and procedures are used by the state in identifying cultural resources eligible for listing in the California Register of Historic Resources. The NHPA does not apply to the SFERP project because there is no federal land or federal permit involved in licensing the project. The law is described here because it is possible that project design changes after licensing could lead to federal permitting and because the NHPA provides a model for California state laws that protect significant cultural resources.

1.2.2 State

Public Resources Code, Section 5024.1 establishes a California Register of Historical Resources [CRHR]; sets forth criteria to determine significance; defines eligible properties; and lists nomination procedures.

Public Resources Code, Section 5097.5 states that any unauthorized removal or destruction of archaeological or paleontologic resources on sites located on public land is a misdemeanor. As used in this section, “public lands” means lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.

Public Resources Code, Section 5097.9 prohibits the interference with the free expression of Native American religion as provided in the United States Constitution and the California Constitution; and causing severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine on public property, except on a clear and convincing showing that the public interest and necessity so require.

TABLE 1-1

Applicable Cultural Resource Laws, Ordinances, Regulations, and Standards

LORS	Requirements	Applicability
California Public Resources Code Section 5024.1	Establishes California Register of Historical Resources	Yes
California Public Resources Code Section 5097.5/5097.9	Prohibits causing severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property, except on a clear and convincing showing that the public interest and necessity so require.	Yes
California Public Resources Code Section 5097.98/5097.99	Requires notification to most likely descendants in the event a Native American grave is encountered. Imposes penalties for obtaining or possessing Native American human remains or artifacts.	Yes, if burials are discovered

TABLE 1-1

Applicable Cultural Resource Laws, Ordinances, Regulations, and Standards

LORS	Requirements	Applicability
California Public Resources Code Section 21083.2	Provides that if a lead agency determines that project has significant effect on "unique" archaeological resources the environmental impact report must address those issues.	Yes
California Public Resources Code Section 21084.1	Equates a significant effect on the environment with a substantial adverse change in significance of a historic resource.	Yes
California Administrative Code, Title 14 Section 4307	Prohibits destruction of paleontological, archaeological and historical objects.	Yes
CEQA Guidelines, Title 14 Code of Regulations Section 15126.4(b)	Discusses mitigation measures related to historical resources.	Yes
CEQA Guidelines, Title 14 Code of Regulations Section 15064.5	Defines "historical resources", determines significance of impacts to archaeological and historical resources.	Yes
CEQA Guidelines, Title 14 Code of Regulations Section 15064.7	Defines "cumulatively significant", describes "thresholds of significance."	Yes
California Penal Code, Section 622.5	Makes it a misdemeanor to willfully damage objects or things of archaeological or historical interest.	Yes
California Health and Safety Code, Section 7050.5	Requires that in the event of discovery of human remains, all excavation must cease until the coroner of the relevant county makes certain findings.	Yes, if burials are discovered
San Francisco Building Code, Chapters 16B and 16C	Requires owners to undertake structural analysis of each unreinforced masonry wall; and to undertake alterations to conform to code or to demolish the structure.	Yes
San Francisco Planning Code, Article 10	Provides for the designation of landmarks and historic districts, and recognition of structures of historic, architectural and aesthetic merit.	Yes, if properties are eligible for landmark designation

Public Resources Code, Section 5097.99 prohibits obtaining or possessing Native American artifacts or human remains taken from a grave or cairn and sets penalties for these actions.

Public Resources Code, Section 21083.2 states that if a project may affect a resource that has not met the definition of an historical resource set forth in Section 21084, then the lead agency may determine whether a project may have a significant effect on "unique" archaeological resources; if so, an Environmental Investigation Report (EIR) shall address these resources. If a potential for damage to unique archaeological resources can be demonstrated, such damage must be avoided. If they cannot be avoided, mitigation measures shall be required. The law also discusses excavation as mitigation; discusses the costs of mitigation for several types of projects; sets time frames for excavation;

defines “unique and non-unique archaeological resources;” provides for mitigation of unexpected resources; and sets financial limitations for mitigation under the section.

Public Resources Code, Section 21084.1 indicates that a project may have a significant effect on the environment if it causes a substantial adverse change in the significance of a historic resource; the section further defines a “historical resource” and describes what constitutes a “significant” historical resource.

Title 14, California Code of Regulation (CCR) Section 4307 (14 CCR 4307), states that no person shall remove, injure, deface or destroy any object of paleontological, archaeological, or historical interest or value.

CEQA Guidelines, 14 CCR 15126.4, *Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects*, subsection (b) discusses impacts of maintenance, repair, stabilization, restoration, conservation, or reconstruction of a historical resource. Subsection (b) also discusses mitigation through avoidance of damaging effects on any historical resource of an archaeological nature, preferably by preservation in place, or by data recovery through excavation if avoidance or preservation in place is not feasible. Data recovery must be conducted in accordance with an adopted data recovery plan.

CEQA Guidelines, Title 14 CCR 15064.5, *Determining the Significance of Impacts to Archaeological and Historical Resources*. Subsection (a) defines the term “historical resources.” Subsection (b) explains when a project may be deemed to have a significant effect on historical resources and defines terms used in describing those situations. Subsection (c) describes CEQA’s applicability to archaeological sites and provides a bridge between the application of the terms “historical” resources and a “unique” archaeological resource.

CEQA Guidelines, 14 CCR 15064.7, *Thresholds of Significance*. This section encourages agencies to develop thresholds of significance to be used in determining potential impacts and defines the term “cumulatively significant.”

California Penal Code, Section 622.5. This section provides that anyone who willfully damages an object or thing of archaeological or historic interest can be found guilty of a misdemeanor.

California Health and Safety Code, Section 7050.5. If human remains are discovered during construction, the project owner is required to contact the county coroner.

California Public Resources Code, Section 5097.98. If the county coroner determines that the remains are Native American, the coroner is required to contact the Native American Heritage Commission, which is then required to determine the “Most Likely Descendant” to inspect the burial and to make recommendations for treatment or disposition of the remains and any associated burial items.

State CEQA Process — CEQA requires a review to determine if a project will have a significant effect on archaeological sites or a property of historic or cultural significance to a community or ethnic group eligible for inclusion in the CRHR (CEQA Guidelines).

CEQA provides that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the

environment (Section 21084.1 of the Public Resources Code). CEQA defines substantial adverse change as demolition, destruction, relocation, or alteration that the significance of a historical resource would be impaired (Section 5020.1). Section 21084.1 stipulates that any resource listed in, or eligible for listing in, the CRHR³ is presumed to be historically or culturally significant unless the preponderance of evidence demonstrates the contrary.⁴

Resources listed in a local historic register or deemed significant in a historical resource survey (as provided under Section 5024.1g) are presumed to be historically or culturally significant unless the preponderance of evidence demonstrates they are not.

A resource may be historically significant even if it is: 1) not listed in, or determined to be eligible for listing in, the CRHR, 2) not included in a local register of historic resources, and 3) not deemed significant in a historical resource survey (Section 21084.1; see Section 21098.1).

CEQA requires a Lead Agency to identify and examine environmental effects that may result in significant adverse effects. Where a project may adversely affect a unique archaeological resource,⁵ Section 21083.2 requires the Lead Agency to treat that effect as a significant environmental effect and prepare an EIR. When an archaeological resource is listed in, or is eligible to be listed in, the CRHR, Section 21084.1 requires that any substantial adverse effect to that resource be considered a significant environmental effect. Sections 21083.2 and 21084.1 operate independently to ensure that potential effects on archaeological resources are considered as part of a project's environmental analysis. Either of these benchmarks may indicate that a project may potentially have an adverse effect on archaeological resources.

Other state-level requirements for cultural resources management appear in the California Public Resources Code Chapter 1.7, Section 5097.5 (Archaeological, Paleontological, and Historical Sites), and Chapter 1.75, beginning at Section 5097.9 (Native American Historical, Cultural, and Sacred Sites) for lands owned by the state or a state agency.

3 The California Register of Historical Resources is a listing of "those properties which are to be protected from substantial adverse change." Any resource eligible for listing in the California Register is also to be considered under CEQA.

4 A historical resource may be listed in the California Register of Historical Resources if it meets one or more of the following criteria: "(1) is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; (2) is associated with the lives of persons important to local, California or national history; (3) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or, (4) has yielded or has the potential to yield information important in prehistory or history (...of the local area, California or the nation)" (Public Resources Code §§5024.1, Title 14 CCR, Section 4852). Automatic CRHR listings include National Register of Historic Places (NRHP) listed and determined eligible historic properties (either by the Keeper of the NRHP or through a consensus determination on a project review); State Historical Landmarks from number 770 onward; Points of Interest nominated from January 1998 onward. Landmarks prior to 770 and Points of Historical Interest may be listed through an action of the State Historical Resources Commission.

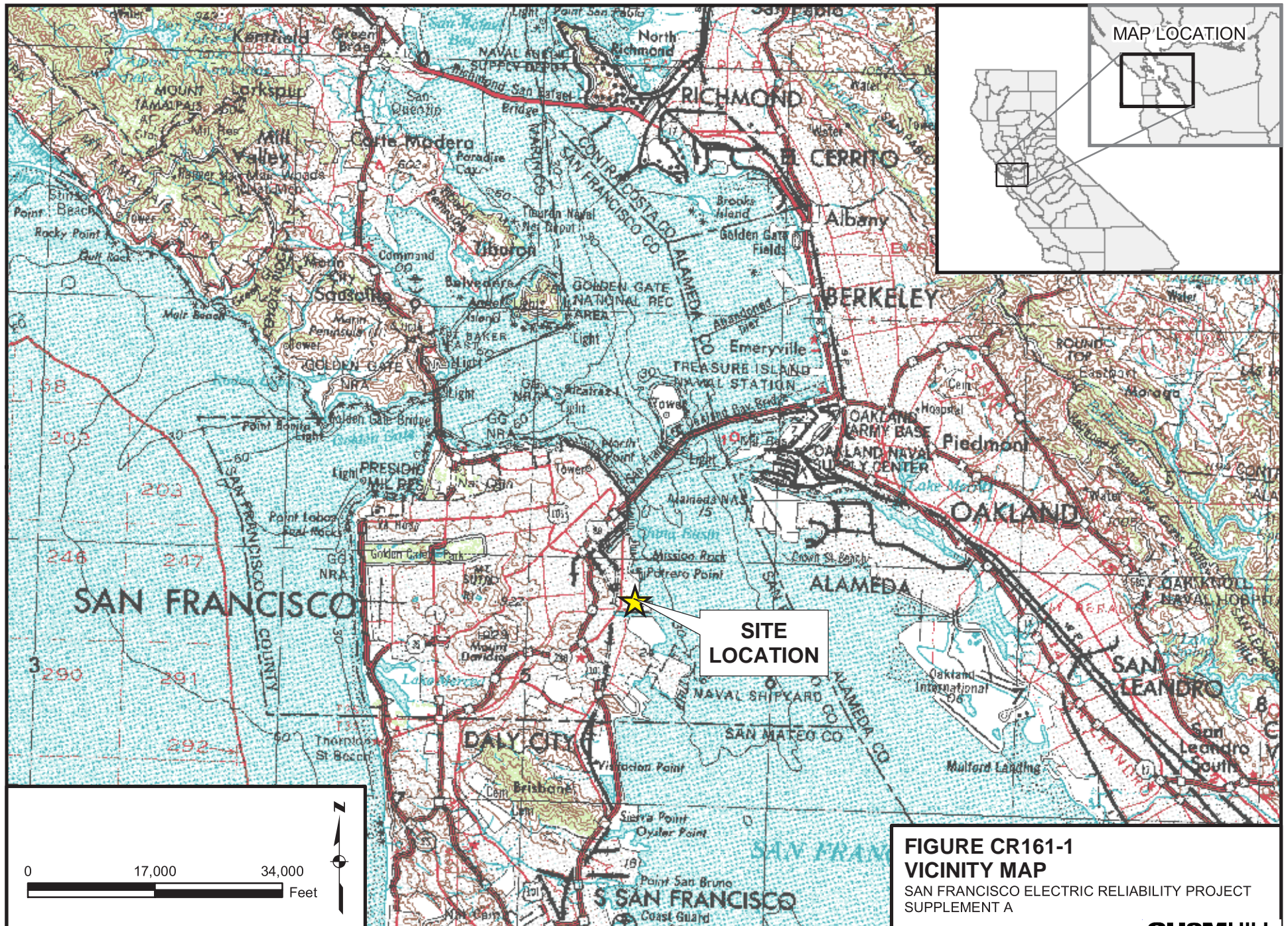
5 Public Resources Code 21083.2 (g) defines a unique archaeological resource to be: An archaeological artifact, object, or site, about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or, (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

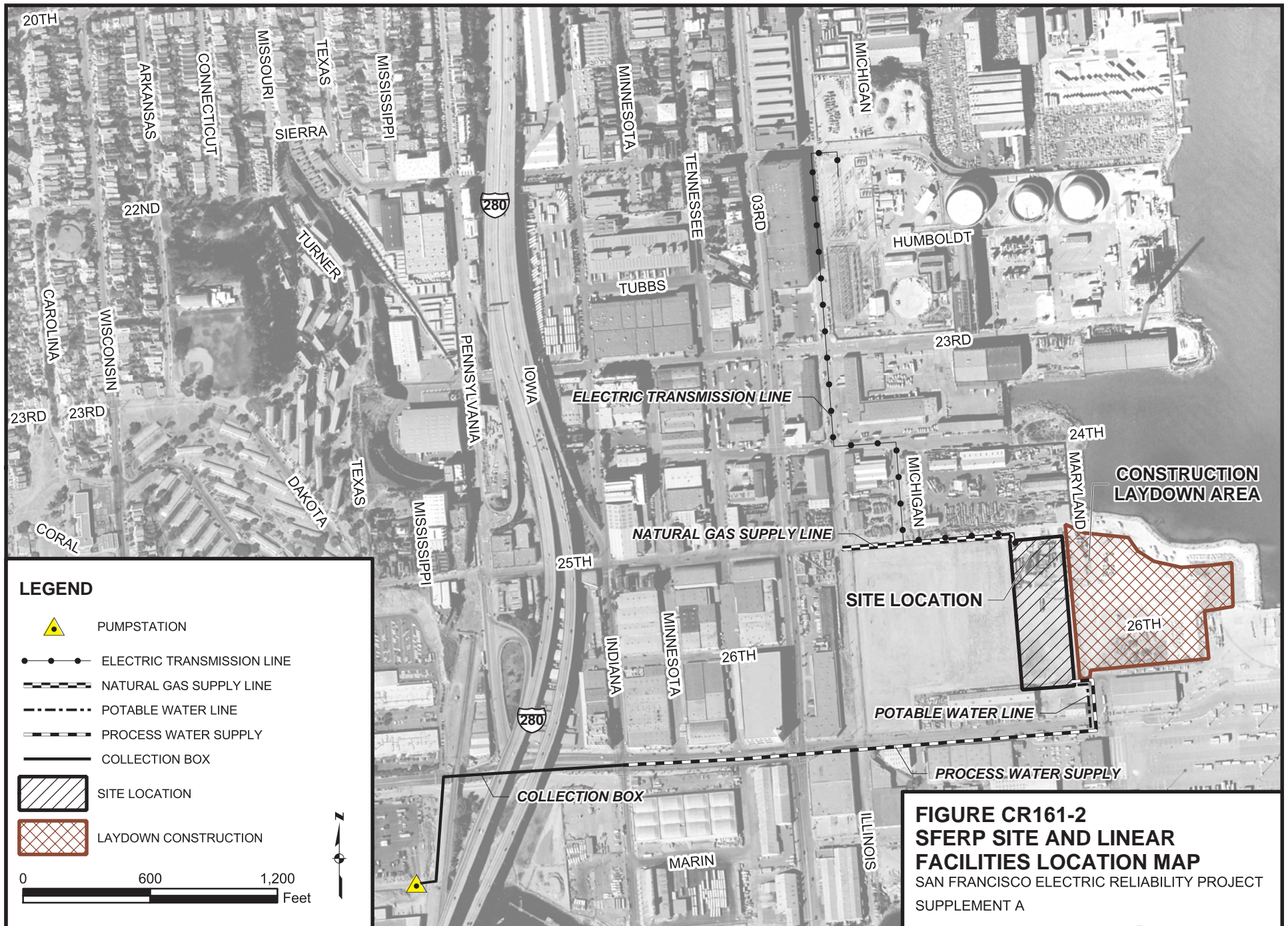
The disposition of Native American burials is governed by Section 7050.5 of the California Health and Safety Code and Sections 5097.94 and 5097.98 of the Public Resources Code, and falls within the jurisdiction of the Native American Heritage Commission (NAHC).

If human remains are discovered, the San Francisco Medical Examiner (Coroner) must be notified within 48 hours and, until his arrival, there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the Coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native American so they can inspect the burial site and make recommendations for treatment or disposal.

1.2.3 Local

The San Francisco Building Code, Chapters 16B and 16C, requires owners of unreinforced masonry walls to undertake a structural analysis. If the building does not meet the minimum standards of the code and any exceptions, the owner must structurally alter the building to conform to the code or have the building demolished. San Francisco Planning Code Article 10 provides a mechanism to encourage historic preservation in the case of permits for the alteration or demolition of buildings that are (1) initiated as land marks, (2) designated as land marks, or (3) located within a district that has been designated as a historic district under Article 10. This article allows the City to maintain a list of buildings and structures which have been “officially designated by agencies of the State or federal government.”





2.0 Setting

The project area is located on the San Francisco Peninsula, a northward extension of the Santa Cruz Mountains that separates San Francisco Bay from the Pacific Ocean. The project area is an industrial area within the City of San Francisco. The project is located on land reclaimed from San Francisco Bay south of Potrero Point on the western shoreline of San Francisco Bay about 1.8 miles south of the San Francisco-Oakland Bay Bridge. Potrero Hill rises to an elevation of approximately 300 feet above sea level, one-half mile northwest of the project. The project area is industrial with warehouses to the north and south and the Port of San Francisco Pier 80 shipping complex to the southeast. To the immediate west of the site is an open field to be developed as a MUNI Operations and Maintenance Facility and to the northwest is a residential area at the base of Potrero Hill, known as the Dogpatch Neighborhood.

Potrero Hill is a rocky outcrop that juts into the west shores of San Francisco Bay. Immediately south of Potrero Hill is the Islais Creek Cove, a shallow embayment harboring the sedimentary delta of Islais Creek. Beginning in the 19th Century with fill between wharves and rail trestles, much of Islais Creek Cove has been slowly filled in to create more land in a strategic location. The project site is located on land that was filled between the 1930s and 1960s.

2.1 Prehistoric Setting

The earliest documented occupation of the area between San Francisco and Monterey bays dates to about 8,000 years before present (BP). Prior to about 2,000 BP, archaeological evidence suggests that this area was occupied by small groups of hunter-gatherers that exploited both terrestrial and marine resources (mostly shellfish). Approximately 2,500 BP, large shellmound sites began to be occupied around San Francisco Bay. These sites were likely habitation sites with dense shell midden, flaked and ground stone tools, bone tools, beads, ornaments, charmstones, and burials. The shellmounds were occupied until the arrival of the Spanish.

The main marine resource used was shellfish, mostly oysters and bentnose clams. The most important upland resource was acorns gathered from oak trees in the fall. Acorn processing (leaching out the tannic acid and grinding into acorn meal) required a significant amount of labor. Use of acorns as early as 2,500 BP indicates intensification of resource procurement at a relatively early period in prehistory in this area. The beginning of the use of the shellmound sites around San Francisco Bay may correspond with the arrival of Utian language speakers from the Sacramento-San Joaquin Delta area. These Utian speakers were the ancestors of the Costanoans who occupied the Bay Area when the Spanish arrived.

2.2 Ethnographic Setting

The project area lies within the territory occupied by the Native American group (known to the Spanish and 20th century ethnographers) as the Costanoan. The contemporary descendants of this group are members of the Ohlone Indian Tribe. The Costanoan group occupied the coast of California from San Francisco to Monterey and

inland to include the coastal mountains from the southern side of the Carquinez Straits to the eastern side of the Salinas River south of Chalone Creek. Costanoan refers to a language family consisting of eight related languages. Each language was spoken by different ethnic groups within their established geographical area. The political units within each ethnic group were tribelets; each tribelet varied from 50 to 500 people with the average being about 200. Each tribelet had one or more permanent villages and several temporary camps within its territory. Hunting and gathering groups lived in temporary camps when securing resources within the tribelet territory away from the village.

The Ramaytush language speakers occupied the project area. It is estimated that some 1,400 speakers were present in 1770. The Ramaytush speakers were divided into at least 10 tribelets. Each tribelet had a chief, a position inherited patrilineally (through the father's side). The chief fed visitors, directed ceremonial activities, organized hunting, fishing, and gathering activities and directed warfare expeditions. The coastal Costanoan traded with the inland Yokuts (mussels, abalone shells, dried abalone meat, and salt for piñon nuts and other inland products). Acorns from four species of oak were the most important plant food. Nuts, berries, seeds, and roots were also important. Costanoan groups practiced controlled burning of the chaparral to encourage sprouting of seed plants and improve deer and elk browse. The most important foods were deer, rabbit, steelhead, salmon, sturgeon, lampreys, oysters and clams.

The Costanoan lived in thatched dome houses with rectangular doorways and a central hearth. Other structures in the villages included sweathouses, dance enclosures, and an assembly house. Technology included tule balsa canoes, bows and arrows, and baskets. Chipped stone tools were made from chert obtained locally and obsidian obtained in trade with others. Between 1770 and 1797, the Spanish established seven missions in Costanoan territory. Due to introduced European diseases and a declining birth rate, their population decreased from about 10,000 to 2,000 by 1832.

2.3 Historic Setting

Spanish explorers intent on settling the Pacific Coast first reached the San Francisco Bay in 1769, and by 1776, Juan Bautista de Anza, Jose Joaquin Moraga and Fathers Francisco Palou and Pedro Cambon established the Mission Dolores (San Francisco) and the San Francisco Presidio. Mission Dolores was one of 21 Spanish missions extending from San Diego in the south to the mission San Francisco Solano in Sonoma in the north, all established between 1769 and 1823. The presidio was one of four established by the Spanish prior to 1800. In 1774, a fort was also established at Castillo de San Joaquin, later Fort Point. The early history of California is well documented in many sources, including Rice, et al. (1996) and Hoover, et al. (1990).

The Spanish era ended when Mexico won its independence from Spain in 1821. The missions were secularized by the mid-1830s, and former mission lands were granted to soldiers and other Mexican citizens for use as cattle ranches. Mexicans, Europeans, and Americans came to California to take advantage of the generous land grants of the Mexican government. The end of Spain's imperialist policies led, by the 1830s, to a lively hide and tallow trade between the inland ranches and the settlements in the San Francisco Bay Area. The little cove settlement of Yerba Buena, the forerunner of the City

of San Francisco, was founded by Captain William A. Richardson in 1835. As Pacific Coast trade increased through the 1830s and 1840s, the center of activity in the Bay Area was the natural anchorage for trading ships at Yerba Buena. In the summer of 1846, war between Mexico and the US led to the American occupation of San Francisco (see Cole, 1981:13-19 and Hoover, et al., 1990:331-334).

American success in the Mexican-American War in 1848, followed by the Gold Rush of 1849, brought large numbers of Anglo-Americans to San Francisco. As a result, the city experienced many significant changes because it was the seaport nearest the gold fields. San Francisco quickly developed into a shipping and transportation center for a state that was remote and isolated from the rest of the country. Other towns, such as Oakland (incorporated in 1852) and San Jose (which served as the State's first capital in 1849), grew up around the Bay Area. However, San Francisco's growth far outpaced growth in these other areas. Oakland developed more fully after the transcontinental railroad was completed in the Bay Area in 1869. Bay Area towns provided commercial, warehousing, financial, and manufacturing services for the inland mining and agricultural areas of the state (Hoover, et al., 1990:335; Beck and Haase, 1974:30).

In 1847, the local government changed the name of Yerba Buena to San Francisco. As noted, at that time it was a small village fronting a large mud flat and cove that became an instant city in a few short years. Speculators and promoters surveyed a town site in 1847 and began selling lots, some of which were under water. Starting in 1848, the Gold Rush was like a spark that set off a wild rush of development and speculation. Fortune-seekers arrived from all parts of the globe. Sailors abandoned ship to head off for the gold fields. Portions of the Bay and Yerba Buena Cove were filled with the hulks of abandoned ships and other material to create more land for development. By late 1849 development of the City had spread well beyond the bounds of Yerba Buena Cove onto the surrounding area's flats and hills. Shipping companies built wharves hundreds of yards into the bay during the early 1850s. Wells Fargo, Adams and Company, and the Merchants Exchange established headquarters in San Francisco in 1853, as did other commercial institutions soon thereafter; making the City the center of the State's economic activity. The population of San Francisco reached 57,000 in 1860 (Rice, et al., 1996:221-226; Soule, 1855:301-305, 437-441; and Cole, 1981:43-44).

The City expanded along the waterfront to the south and west from Yerba Buena Cove, which was located on the northeast end of the San Francisco peninsula. The Potrero Point area, where the project area is located, is a small finger of land projecting out into the bay south of the core of San Francisco. The city's industrialists developed it as an early industrial area. This area extended from the waterfront to Potrero Hill, located approximately one mile inland. The area was well located at the southern end of the city, close enough to serve as a convenient industrial location but south of the main portion of the new city. By 1855, heavy industry began locating at Potrero Point. A black powder plant was located at the point because of its isolated location. The explosives industry remained at the point until about 1880, when encroachment by residential areas led to its relocation to other areas (San Francisco Planning Department, 2001).

By the 1880s, the Potrero Point area consisted of a grid of streets sparsely populated with warehouses, docks and industrial complexes, roughly bounded by 16th Street on the north and 26th Street on the south. There were numerous substantial industrial and

commercial establishments located at Potrero Point in the vicinity of the waterfront. These included the Pacific Rolling Mills Company, Union Iron Works, and the San Francisco Cordage Factory and Rope Works on the north side of the point, and the California Sugar Refinery and the works of the City Gas Company on the southern end. The California Sugar Refinery was established by Claus Spreckels in 1881, was renamed the Western Sugar Refinery in 1891, and eventually expanded to border Louisiana and Humboldt streets on the east and north and the waterfront on the south and west. North of the California Sugar Refinery was the gas manufacturing plant of the City Gas Company, established at Potrero Point in 1872. The plant was located on blocks bounded by Georgia, Massachusetts, and Humboldt Streets, and its facilities included two 1,038,000-cubic-foot gas storage tanks. Portions of this well-equipped complex survived, and were later incorporated into the PG&E plant built at the site. The industrial and storage works of the California Sugar Refinery, and the City Gas Company plant, were the first major developments to occur in the project location (San Francisco Planning Department, 2001:8-9; Sanborn, 1886-1887, 1900; USGS, 1895, 1899; and Coleman, 1952:28-29).

The Western Sugar Refinery complex at Potrero Point was established to refine and produce sugar made from Hawaiian sugar cane. It eventually became the largest sugar refinery in the western United States. The facility consisted of several multi-story brick buildings that functioned as a refinery, and filter house. The complex also consisted of several brick warehouses, coal bunkers, storage tanks, a sack house, stock corrals, a large storage reservoir, and wharves. A Southern Pacific Railroad spur ran down 23rd street to the wharf. The refinery operated until 1949, when it was purchased by its major competitor, the California and Hawaiian Sugar Refining Corporation (C&H) (Sanborn Fire Insurance Maps, 1900, 1915, 1950; San Francisco Planning Department, 2001:10-11). C&H also had an extensive factory complex with ocean-shipping facilities in Crockett on the Carquinez Straits.

The first decades of the 20th century were a period of rapid expansion in the Bay Area. In the Potrero area, industrialists filled the shallows in the Bay to the south of Potrero Point between 1899 and 1914, and constructed a wharf along the south end of Potrero Point. During the same period the San Francisco Shipyard was constructed on the north end of Potrero Point. The area underwent a period of reconstruction and further expansion after the devastating 1906 earthquake that destroyed many 19th century buildings and structures in San Francisco (USGS, 1899, 1915). Buildings in the gas works and in the sugar complex survived the disaster.

The San Francisco Gas and Electric Company (SFG&E) purchased the City Gas Works Plant at Potrero Point in 1897. Formed from a consolidation of the San Francisco Gas and Light Company and Edison Light and Power Company in 1896, SFG&E had absorbed many smaller competitors by 1901. However, at that time there were other companies competing for customers in a rapidly expanding utility industry, resulting in an intense rate war.

This rate war was illustrated by two competing utility companies with plants at Potrero Point. One of SFG&E's competitors was Claus Spreckels, who, in 1899 and 1901, incorporated the Independent Electric Light and Power Company and Independent Gas and Power Company. In 1901, Spreckels built an electric generating plant adjoining his

Western Sugar Refinery at Potrero Point, located south of the SFG&E plant at Potrero. The state-of-the-art plant consisted of a large brick structure that housed a steam-powered electrical generating plant with a 5,000-kilowatt capacity, and had an adjoined gas plant. The plant was constructed on the west side of Louisiana Street, on the site formerly owned by the California Barrel Company. The rate war ensued until 1903, when Spreckels and others sold their works to SFG&E, ending the competition. In 1906, the San Francisco Gas & Electric was renamed Pacific Gas & Electric (PG&E), and the former Spreckels facility at Potrero, which was more modern and up-to-date than the other SFG&E facility at Potrero, became known as Station A. It was one of two power plants in the area that survived the 1906 earthquake and was subsequently expanded as the city was rebuilt. By 1914, the PG&E facility was expanded to the west between Louisiana and Michigan Streets, including the construction of large 1- and 5-million-cubic-foot gas holders. During this year the Meter House was constructed. The plant was also expanded to the south of 23rd Street, with a gas pump and gas holder constructed near the south wharf at Potrero Point (Coleman, 1952:82-91, 236; Sanborn Fire Insurance Maps, 1900, 1914).

PG&E's Station A was the largest steam electric plant west of the Rocky Mountains from 1903 through 1913, and supplied almost all of San Francisco's electricity during this period. In 1924, the Compressor House was constructed on the site. Later, when PG&E developed cheaper hydroelectric power, Station A was used to supplement the hydroelectric power during periods of peak use. PG&E modernized the station's equipment throughout the years, and with the continuing upgrades Station A remained in operation until 1983. The company placed the Potrero gas plant on standby from 1929 to 1960, when much of it was demolished (California Energy Commission, 2002:5.4.7).

Fire insurance maps prepared between 1915 and 1950 show that the south end of Potrero Point was occupied by the PG&E facility and the Western Sugar Refinery (C&H). During this period Kentucky Street was renamed Third Street. Between 1915 and the early 1940s many of the PG&E and Western Sugar Refinery structures remained at the waterfront between 22nd and 23rd street, but the structures along the south wharf were replaced. By the 1950s, much of the C&H sugary refinery had been removed, and by the mid-1960s, many of the PG&E structures north of Humboldt Street had also been removed (Sanborn Fire Insurance Maps, 1914, 1950; USGS 1915, 1942, 1946, 1947a,b, 1948, 1950, 1956, and 1968; San Francisco Planning Department, 2001:10-11). The dense concentration of industrial buildings on the location of the PG&E and C&H complexes can be seen in several historic photographs included in the CWD report (especially Figure 6, an aerial photograph taken between 1929 and 1934). This image shows the complex of buildings that served the sugar industry east of Station A, all but two of which have since been removed (San Francisco Planning Department, 2001:14).

2.4 Potential for Buried Resources

The SFERP is located in an area that was formerly part of the Islais Creek Cove on the San Francisco Bay shoreline. In fact, much of the project site route is located in areas that were part of the Bay as late as 1931 (AGS, 1999). Construction of the water supply pipeline will cross areas of fill that are likely to be of low sensitivity for prehistoric and historic archaeological resources, with some exceptions. The electrical transmission line will cross the prehistoric shoreline into areas that are of high sensitivity for prehistoric

resources. For these reasons, a brief discussion of the local history of San Francisco Bay fill development is appropriate to foresee in which areas significant buried resources might be found. A similar analysis was conducted on behalf of the Mirant Corporation for its Cooling Tower System Amendment to the Application for Certification, Potrero Power Plant Unit 7 (00-AFC-04), response Staff Data Requests 216 through 220 (Mirant Corporation, 2003).

The history of land use and Bay filling in the area provides some clues to the kinds of buried cultural resources that might be present. This account closely follows the historic context statement for the Central Waterfront District historic resources survey report and the Dogpatch Historic District context statement (San Francisco Planning Department, 2001; VerPlanck, 2001).

The Potrero Point area was first occupied by industry about 1854, when the E.I. duPont deNemours Company constructed a black powder magazine to the northwest of the SFERP site. At this time, Potrero Point was a rocky peninsula located between Mission Bay to the north and the Islais Creek Cove to the south. One year later, the Hazard Powder Company constructed a similar facility along what was at that time the southern shore of Potrero Point (near what is now 23rd Street). Powder was in great demand for mining and general construction uses. Later both companies constructed wharves for loading the powder onto ships. By 1881, both companies had sold their interests to the Claus Spreckels sugar company, due to the increasing encroachment of residential areas.

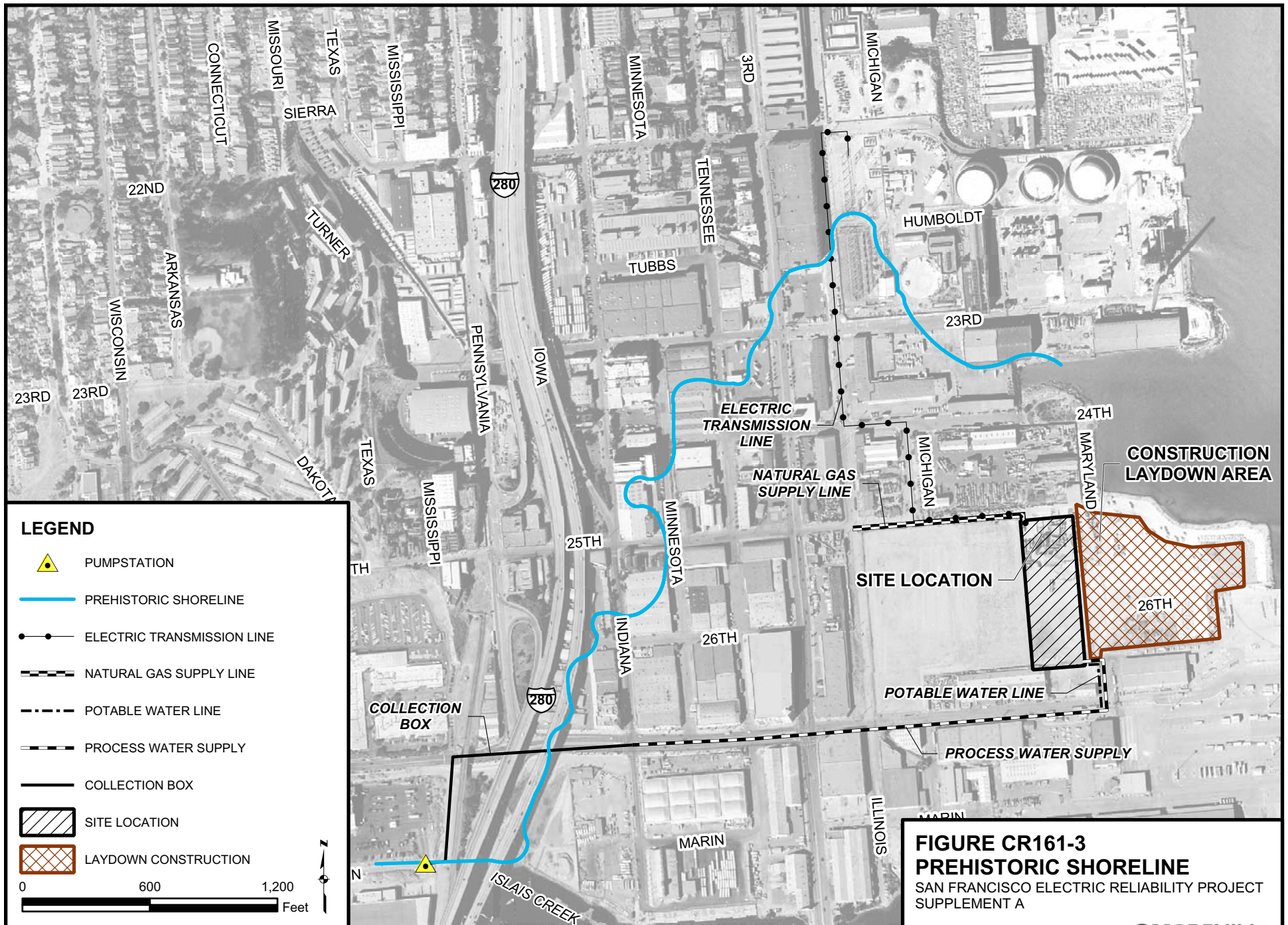
Another early industry in the Potrero Point area was the San Francisco Cordage Manufactory, later called Tubbs Cordage Company. Established in 1857, the company made ropes, largely for marine and mining purposes. For many years, Tubbs Cordage was a major area employer, although the company gradually declined before closure in 1962. Tubbs was located northwest of the SFERP site, along 3rd (Kentucky) Street, between 22nd and 23rd streets. One very interesting feature of the Tubbs operation was the Tubbs Cordage rope walk, as depicted in the Sanborn Insurance Maps for 1899 (Sanborn Inc., 1900). The rope walk was a long (at first, 1,000 feet, later 1,500 feet), covered walkway that extended out into the Bay on piers. It was used by the cordage workers as they twisted fiber strands together to make long ropes. The rope walk ran in a southeastern direction from the cordage plant, crossing into the Bay from 3rd Street north of 23rd Street. In doing so, it crossed the location of the SFERP underground electrical transmission line along what is now 23rd Street near Illinois Street.

Another important local early development was the construction of the Potrero, Hunters Point, and Bay View (P&BV) Railroad and its bridges, the Long Bridge and 3rd Street Trestle. The Long Bridge was a rail trestle constructed across Mission Bay in 1867 and the 3rd Street Trestle crossed Islais Creek Cove a year later (U.S. Coastal Survey, 1869). The railway was constructed as a north-south connector between downtown San Francisco and the Bay View area, and was double-tracked for two-way horse-drawn trolleys. The railroads that constructed the P&BV line and the bridges (Southern Pacific and Atchison, Topeka, and Santa Fe), acquired real estate rights to adjacent lands on the condition that they fill Mission Bay and the Islais Creek Cove to make industrial land. The filling of Islais Cove was delayed; however, until after the turn of the century. The SFERP process water pipeline crosses the 3rd Street trestle alignment at right angles on Cesar Chavez Street. By 1899, Cesar Chavez Street (then Army Street) extended

eastward to meet the trestle in the Bay. It is not clear whether the Army Street connector was created on fill or on a trestle. The trends in bay fill are shown on early topographic maps (U.S. Coastal Survey, 1869; U.S. Geological Survey, 1896, 1896, 1915a, 1915b, 1942, 1947; Sanborn Inc., 1900) (Figure CR161-3 shows the approximate boundary of the prehistoric shoreline).

By 1915, the Western Pacific Railway had constructed a spur that extended the 25th Street alignment east to the 3rd Street trestle and beyond it to a jetty along what is now 25th Street. Though Mission Bay had been filled by this time and the 3rd Street rail corridor had been widened, the former Islais Creek Cove was still unfilled. Based on historic maps and aerial photographs, the project site was reclaimed from Islais Creek Cove of San Francisco Bay sometime between 1931 and 1966 in conjunction with the Pacific Ferry Slip, a railyard, and port development (see additional discussion, Section 4.3).

Filling began to the northwest of the project site approximately 1931, when the Western Pacific Ferry slip was constructed at 25th and Delaware Streets (AGS, 1999) (Figure CR161-4). Sometime after 1935, Western Pacific filled the northern half of the property for a railyard serving the ferry terminal. This yard included extensive trackage across the project site, and served as a switchyard for ferried freight cars. Maps of the 1940s (USGS 1942, 1946, 1947, 1948) show a series of railroad tracks along the current 25th Street alignment, expanding to cover the northern third or so of the project site by 1947. The site assessment conducted for the San Francisco Municipal Railway system (AGS, 1999) interprets maps and aerial photographs as indicating a possible storage shed area just to east of the southern part of the project site, a machine shop and maintenance area to the west, and "general track" on the north end of the parcel, with a possible engine house or maintenance building at the north (25th Street) end of the parcel. Also according to this study, the remainder of the fill that is in place today in the project area north of the Islais Creek channel was placed there between 1955 and 1966, as Cesar Chavez (then Army) Street was extended for construction of the Port of San Francisco Pier 80 terminal.



ILLINOIS ST

MICHIGAN ST

25TH ST

26TH ST

CESAR CHAVEZ ST

ILLINOIS ST

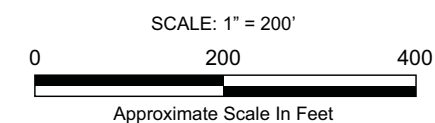
MICHIGAN ST

Approximate Location
of 1935 Shoreline

Approximate Location
of 1948 Shoreline

Approximate Location
of 1955 Shoreline

Approximate Location
of Current Shoreline
(Since 1966)



SFERP Project Site

FIGURE CR161-4
PROJECT AREA FILL PROGRESSION
SAN FRANCISCO ELECTRIC RELIABILITY PROJECT
SUPPLEMENT A

3.0 Literature Review

A California Historic Resources Information System records search (NWIC 03-548) was conducted on February 3, 2004 for the original project site to check for recorded resources. A second record search was conducted for the new project site on January 26, 2005.

Previous investigations for the Mirant Potrero Unit 7 Project (00-AFC-4) (Wirth Associates 1979) did not identify any archaeological resources in the SFERP project area, but concluded that there was a low to moderate potential for buried prehistoric resources and a moderate to high potential for buried historic resources. Several industrial buildings more than 50 years old were identified in the project vicinity, mostly located west of Third Street. The I.M. Scott School, built in 1895 and located at 1060 Tennessee Street, is San Francisco Historical Landmark 138 (SECAL, 2000c).

3.1 Architectural Resources

In 2002 the San Francisco Department of Planning conducted a cultural resources survey of the Central Waterfront (which included the proposed project site) sponsored by the State Office of Historic Preservation (see San Francisco Planning Commission, 2001). The survey was accepted by the San Francisco Planning Commission and forwarded to the State Office of Historic Preservation to review the eligibility of the District for listing in the CRHR. The CWD report recommended that “at the very minimum, the Central Waterfront area’s historic resources should be given special consideration” in local land use planning (San Francisco Planning Commission, 2001:10, 27).

As a result of the Central Waterfront Survey, there are two officially-recognized and eligible historic districts, Dogpatch and Pier 70, both of which are completely within the boundaries of, and are part of, a third, larger historic district called the Central Waterfront District (CWD).⁶ These districts share common historical themes, focusing on the industrial nature of the area, along with the theme of residential and commercial development for local industrial workers and of the City of San Francisco.

The Central Waterfront District, with its embedded Dogpatch and Pier 70 historical areas, contains 243 buildings of CRHR status levels (status codes of 1, 2, 3, 4, 5, 7) in the state historic property file (or CHRIS List) that are individually listed on the NRHP (code 1), determined eligible (code 2), appear to be eligible (code 3), may become eligible (code 4), are eligible for local list only (code 5), or have not been evaluated or whose status is underdetermined (code 7). These include resources that might be contributors either to the larger district or the individual districts. Another 32 buildings have been evaluated as code 6 (determined ineligible or delisted); 29 are 6Z1 (found ineligible with no potential for listing); two are 6Z (found ineligible); and one is 6Y2 (found ineligible by consensus determination but not evaluated for local listing).

⁶ The inventory of the Central Waterfront District was completed in October of 2001 under a grant from the SHPO to the San Francisco Planning Department. It was approved by the San Francisco Planning Commission and is currently under review at the SHPO for its potential to be included in the CRHR. See: San Francisco Planning Department, “Central Waterfront Cultural Resources Survey Summary Report and Draft Context Statement, October 2000 – October 2001.” CEC Dockets, 00-AFC-4.

The area around the proposed SFERP power plant and switchyard has thus been the subject of a number of historic property inventory and evaluation efforts over the past two decades. During the course of these efforts almost every building over 50 years old has been evaluated for its eligibility under criteria of significance and integrity established by the NRHP or CRHR. The result of these surveys is that the historic architectural resources in the area of the project site are well known and understood.

The project site and proposed laydown area (bounded roughly 25th Street on the north, Cesar Chavez Street on the south, the bay on the east, and Michigan Street on the west) were examined as a part of the Central Waterfront District survey and the present project. Since the area is fenced, there was limited access to the site; however, it appears (from the public right-of-way) to have no historic period structures (at least 45 years old). A concrete mixing plant, temporary offices, and containers are currently located on the site. An aerial photograph dated July 1993 shows the area as completely vacant (TerraServer, 2003). Given the existence of various inventory projects, no additional historic buildings and structures inventory or evaluation was undertaken.

The nearest historic structures that have been deemed eligible for inclusion in the National Register of Historic Places are two warehouses located approximately 700 feet north of the SFERP project site. These two structures are located on 23rd Street and are the only remaining buildings of the California Sugar Refinery, which was constructed in 1881 by San Francisco industrialist Claus Spreckels. The California & Hawaiian Sugar Refining Corporation purchased the property in 1949 and demolished the plant and most of the buildings in 1951. According to the San Francisco Planning Department's (2001) Central Waterfront Cultural Resources survey, DPR-523 building record form, the buildings were constructed in 1923 and 1929, respectively, as part of a facility expansion. They were used for final preparation and packaging of sugar products. Their reinforced concrete construction represented an advance over the use of wooden or brick buildings for sugar processing and storage because it was easier, in these buildings, to keep the sugar dry. This City report recommends that these properties be evaluated as contributors to a potential Pier 70 historic district or as individual historic resources and that they are eligible for listing in the National Register under Criterion A at the local level of significance. The DPR-523 building record indicates that these two buildings are "little altered and possess integrity of location, design workmanship, materials, and association." It also states that "by the loss of the rest of the plant, there is a substantial loss of integrity of setting and feeling."

This change in setting that the SFERP causes would be modest, and would not significantly damage the integrity of setting, feeling, and association of these buildings. All of the other buildings associated with the sugar refinery on Potrero Point have been demolished, so a great deal of their historical integrity of setting has been removed, as the DPR-523 form notes. As stated above, these properties are significant because of their integrity of location, design, workmanship, and association, but not because of their integrity of setting or feeling, which has been significantly diminished by the removal of the remainder of the sugar refinery buildings.

3.2 Archaeological Resources

CHRIS records search NWIC 03-548 revealed no recorded archaeological resources in the SFRP project area (Appendix A). A prehistoric archaeological site, CA-SFR-15 (P-38-000015) is recorded approximately 0.5 miles south of Marin Street (which is the terminus of the proposed water supply pipeline). A historic resource (P-38-004274) is located just south of CA-SFR-15 (and is approximately 0.6 miles south of Marin Street). Resource P-38-004274 is the Islais Creek Sewage Treatment Plant, which was recommended by its recorder as NRHP Status Code 3S (eligible under Criterion C for design qualities at the local and regional levels of significance) (Kelley, 2002). No resources are recorded on or adjacent to the project site or construction laydown site. A 2005 CHRIS records search update (NWIC 04-687) revealed no newly recorded cultural resources located within or near the project site, laydown area, or linear facilities.

As described previously, the project site was reclaimed from Islais Creek Cove of San Francisco Bay sometime between 1931 and 1966. Filling began to the northwest of the project site approximately 1931, when the Western Pacific Ferry slip was constructed at 25th and Delaware Streets (AGS, 1999). Sometime after 1935, Western Pacific filled the northern half of the property for a railyard serving the ferry terminal. This yard included extensive trackage across the project site, and served as a switchyard for ferried freight cars. Maps of the 1940s (USGS 1942, 1946, 1947, 1948) show a series of railroad tracks along the current 25th Street alignment, expanding to cover the northern third or so of the project site by 1947. The site assessment conducted for the San Francisco Municipal Railway system (AGS, 1999) interprets maps and aerial photographs as indicating a possible storage shed area just to east of the southern part of the project site, a machine shop and maintenance area to the west, and “general track” on the north end of the parcel, with a possible engine house or maintenance building at the north (25th Street) end of the parcel. Also according to this study, the remainder of the fill that is in place today in the project area north of the Islais Creek channel was placed there between 1955 and 1966, as Cesar Chavez (then Army) Street was extended for construction of the Port of San Francisco Pier 80 terminal.

Previous geotechnical studies for the former PG&E Potrero project provide some insights regarding the potential for encountering submerged buried cultural resources in the bay. Eucalyptus fragments found in a geotechnical boring at a depth of 9 to 23 feet suggest the presence of a wood pile at the location. Small wood fragments were found in 8 of the 31 sediment samples. No other historical material was recovered. The eucalyptus wood pile and small wood fragments were interpreted as representing remnants of the East Wharf/Sugar Dock associated with the Western Sugar Refinery. The wharf was the only structure built in the water in the Potrero project area and was demolished sometime between 1950 and 1975. The eucalyptus wood pile may have supported the wharf. The small wood fragments probably represent remnants of the wharf material deposited on the bayfloor after demolition (SECAL, 2000c). It is not likely that historical material dating prior to the 20th century exists on the bay floor in the project area. This area was probably dredged in order to accommodate large ships carrying sugar that moored at the East Wharf. Vessels over 400 feet in length are shown moored at the East Wharf of the Western Sugar Refinery in photos dating to the 1930s and 1940s (SECAL, 2000c).

3.3 Native American Consultation

SECAL/Mirant contacted the Native American Heritage Commission (NAHC) to obtain a list of concerned Native Americans living in the San Francisco Area. SECAL/Mirant sent letters to the Native Americans describing the project and asked about concerns. No responses were received. CH2M HILL also contacted the NAHC in December 2003, and received a list of concerned Native Americans. Letters were also sent to the listed Native Americans. No responses have been received through January 29, 2005 (Appendix B). CH2M HILL contacted the Native American Heritage Commission again on May 19, 2005 and received a list of Native American contacts. Letters were sent to the persons and organizations on this list on May 27, 2005 (Appendix B).

4.0 Field Inventory

Archaeological field surveys were conducted for the original (23rd Street) SFERP project site and laydown area in 2004. Additional field surveys of the new site, the underground transmission alignment, natural gas pipeline route, and water supply pipelines (Process and Potable) were conducted on February 21, 2005. The water supply pipelines, electrical transmission line and natural gas pipeline will be installed in trenches within the existing street network, and the process water supply pipeline will enter an existing concrete utility box within Cesar Chavez Street. Native soils underlying these streets are covered by pavement and so were not directly inspected during the survey.

The project site consists of three sections. The northern third of the site is covered by the Pacific Cement Corporation concrete batch plant. At the time of survey, the ground surface in this area was covered entirely by cement and gravel processing equipment, gravel, rock, and cement piles, concrete paving, and water. There do not appear to be remnants of the railroad track or railroad maintenance shed in this area. The central third of the site is vacant, and used for storage of a few large concrete pilings. Ground visibility in this area was excellent on the day of survey. This section is covered in sandy fill with some gravel, rock, concrete, and brick rubble inclusions that are apparently part of the site fill. The southern third of the site is covered in gravel and the ground is not visible. There is a construction trailer on site, apparently associated with development of the adjacent Municipal Railway parcel to the west. Other than the trailer and a very recent area used for testing concrete and other pavement treatments, this section of the parcel was vacant at the time of survey. There were no indications of the previous uses as a railroad yard or of railroad storage or maintenance on the project parcel and no other artifacts or features potentially older than 50 years were identified there.

5.0 Conclusions and Recommendations

There are no archaeological or historic resources at or near the SFERP project site. Construction and operation of the SFERP also would not cause significant indirect adverse impacts to historic properties. Although there are two historic properties located approximately 700 feet to the north (former sugar processing buildings and warehouses), these buildings lack integrity of setting and association and the presence of the SFERP would not affect the qualities of these buildings that make them eligible for listing in the National Register.

Construction of the project will involve excavation below the current ground surface. Because the project site consists entirely of recent (1931 to 1966) fill, however, the chances of encountering significant intact archaeological deposits during construction are low. Pile driving for project foundation supports will extend below this fill layer into the former bay sediments where it is possible that they could encounter prehistoric deposits or historic ship remains. The existence of such remains, however, is speculative, and detection and evaluation of them, if present, may not be feasible.

For the project linear appurtenances, there are several general statements that we can make regarding the likelihood of discovering different kinds of buried archaeological or historic resources during excavations for these features.

1. Buried prehistoric Native American resources are likely to be found in the former shoreline areas. Prehistoric shoreline and marsh-edge site types such as special extraction camps, fishing camps, and shell midden mounds are very likely to occur in these areas. The underground transmission line route crosses into the prehistoric shoreline zone north of the SFERP site between 22nd and 23rd Streets on Illinois Street. The process water supply pipeline route does not approach the shoreline, since it enters the utility collection box on Cesar Chavez Street at Indiana, which is within the Islais Creek Cove fill area.
2. Remnants of the 3rd Street trestle may possibly be located where Cesar Chavez Street crosses 3rd. However, Wirth Associates (1979) excavated a 12-foot-deep trench in the area of 23rd and 3rd, and did not find remnants of the trestle or of the Tubbs Cordage rope walk.
3. The entire gas pipeline and water supply pipeline routes, and much of the electrical transmission line route run through bay fill. It is possible, though unlikely, that buried boats, ships, or wharves could be encountered during excavations in these areas. The electrical transmission route crosses the former location of the Tubbs Cordage rope walk just north of 23rd Street. The U.S. Coastal Service map for 1869, shows a long wharf extending eastward into Islais Creek Cove in the vicinity of 25th Street, and this same route was later taken by the Western Pacific Railroad for its jetty, extending beyond 3rd Street along the natural gas pipeline route.
4. The pipeline route along Cesar Chavez Street west of 3rd Street was either trestle or fill by 1899. It is thus possible that excavations here will encounter trestle pilings.

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APPENDIX A

Record Search

Note: The record search report (NWIC 03-548) has been filed at the California Energy Commission under a request for confidentiality under docket Number 04-AFC-001. The record search update (NWIC 04-687) was not conducted by NWIC staff, so a separate written report was not generated. This record search update is reported in this document.

APPENDIX B

Native American Consultation Letters

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
Fax (916) 657-5390
Web Site www.nahc.ca.gov



May 24, 2005

Douglas M. Davy, Ph.D.
Consulting Archaeologist
CH2MHILL
2485 Natomas park Drive, Suite 600
Sacramento, CA 95833

Sent by Fax: 916-614-3473
No. of Pages: 2

RE: Proposed San Francisco Electric Reliability project application for certification to the CA energy Commission San Francisco County.

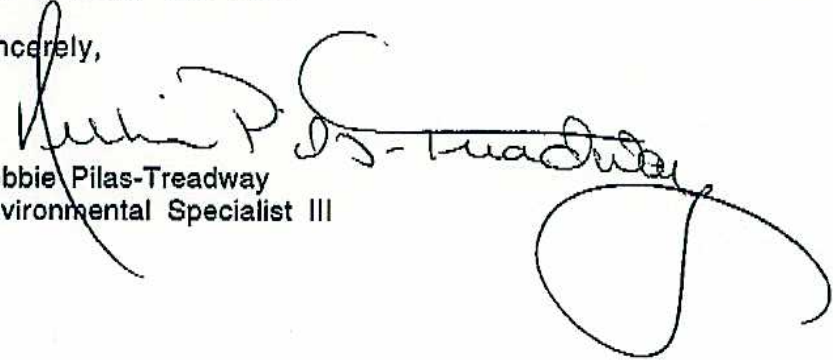
Dear Dr. Davy:

A record search of the sacred lands file has failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the sacred lands file does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Enclosed is a list of Native Americans individuals/organizations who may have knowledge of cultural resources in the project area. The Commission makes no recommendation or preference of a single individual, or group over another. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend other with specific knowledge. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at (916) 653-4038.

Sincerely,


Debbie Pilas-Treadway
Environmental Specialist III

Native American Contacts
San Francisco County
May 24, 2005

Jakki Kehl
 720 North 2nd Street
 Patterson, CA 95363
 jakki@bigvalley.net
 (209) 892-2436
 (209) 892-2435 - Fax

Ohlone/Costanoan

The Ohlone Indian Tribe
 Andrew Galvan
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 Mission San Jose, CA 94539
 chochenyo@AOL.com
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 (510) 882-0527 - Cell
 (510) 687-9393 - Fax

Ohlone/Costanoan
 Bay Miwok
 Plains Miwok
 Patwin

Ella Rodriguez
 PO Box 1411
 Salinas, CA 93902
 (831) 632-0490 - home
 (831) 261-5827 - cell

Ohlone/Costanoan
 Esselen

Trina Marine Ruano Family
 Ramona Garibay, Representative
 6626 Thornton Ave
 Newark, CA 94560
 510-794-5462

Ohlone/Costanoan
 Bay Miwok
 Plains Miwok
 Patwin

Amah/Mutsun Tribal Band
 Michelle Zimmer, Cultural Resource Coordinator
 PO Box 62-558
 Woodside, CA 94062
 (408) 866-1594

Ohlone/Costanoan

Amah/Mutsun Tribal Band
 Irene Zwiernlein, Chairperson
 789 Canada Road
 Woodside, CA 94062
 amah_mutsun@yahoo.com
 (650) 851-7747 - Home
 (650) 851-7489 - Fax

Ohlone/Costanoan

Indian Canyon Mutsun Band of Costanoan
 Ann Marie Sayers, Chairperson
 P.O. Box 28
 Hollister, CA 95024

Ohlone/Costanoan

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed San Francisco Electric Reliability project application for certification to the Ca Energy Commission, San Francisco County.



CH2MHILL

CH2M HILL

2485 Natomas Park Drive

Suite 600

Sacramento, CA 95833

May 27, 2005

Michelle Zimmer
Cultural Resource Coordinator
Amah/Mutsun Tribal Band
PO Box 62-558
Woodside, CA 94062

Dear Michelle:

Subject: San Francisco Public Utilities Commission – San Francisco Electric Reliability
Project Application for Certification to the California Energy Commission

CH2M HILL is assisting the San Francisco Public Utilities Commission prepare its Application for Certification for a 145-megawatt (MW) natural gas-fired power plant.

The project site is located near the San Francisco Bay in the Potrero District of San Francisco, on a 4-acre site of City-owned land that is surrounded by industrial development. The site is zoned for industrial use. The center of the SFERP site is located at approximately 37°47'7.50" N. latitude and 122°23'0.82" W. longitude in Township 2 S., Range 5 W. This township has never been surveyed into sections because it was part of an original Spanish land grant. All the proposed SFERP facilities will be located within either the southernmost portion of the U.S. Geological Survey (USGS) San Francisco North or the northernmost portion of the San Francisco South 7.5' (1:24,000-scale) standard topographic maps. The site is located on Block 474 and portions of Blocks 473, 467, and 468.

The Native American Heritage Commission provided CH2MHILL, with your name and address as someone who may have knowledge of heritage lands or other resources of interest that the Project would potentially affect cultural resources in the project area. Please notify us if there are any sites or locations of specific concern within the Project vicinity. Attached is a map showing the site location.

Please contact me at (916) 286-0278 or ddavy@ch2m.com if you have any questions or comments. We greatly appreciate your attention to this matter.

Sincerely,

CH2M HILL

Douglas M. Davy, Ph.D.
Consulting Archaeologist

Enclosure - Map



CH2MHILL

CH2M HILL

2485 Natomas Park Drive

Suite 600

Sacramento, CA 95833

May 27, 2005

Andrew Galvan
The Ohlone Indian Tribe
PO Box 3152
Mission San Jose, CA 94539

Dear Andrew:

Subject: San Francisco Public Utilities Commission – San Francisco Electric Reliability
Project Application for Certification to the California Energy Commission

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CH2M HILL

Douglas M. Davy, Ph.D.
Consulting Archaeologist

Enclosure - Map



CH2MHILL

CH2M HILL

2485 Natomas Park Drive

Suite 600

Sacramento, CA 95833

May 27, 2005

Ramona Garibay, Representative
Trina Marine Ruano Family
6626 Thornton Ave
6626 Thornton Ave
Newark, CA 94560

Dear Ramona:

Subject: San Francisco Public Utilities Commission – San Francisco Electric Reliability
Project Application for Certification to the California Energy Commission

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CH2M HILL

Douglas M. Davy, Ph.D.
Consulting Archaeologist

Enclosure - Map



CH2MHILL

CH2M HILL

2485 Natomas Park Drive

Suite 600

Sacramento, CA 95833

May 27, 2005

Ann Marie Sayers
Chairperson
Indian Canyon Mutsun Band of Costanoan
PO Box 28
Hollister, CA 95024

Dear Ann Marie:

Subject: San Francisco Public Utilities Commission – San Francisco Electric Reliability
Project Application for Certification to the California Energy Commission

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CH2M HILL

Douglas M. Davy, Ph.D.
Consulting Archaeologist

Enclosure - Map



CH2MHILL

CH2M HILL

2485 Natomas Park Drive

Suite 600

Sacramento, CA 95833

May 27, 2005

Irene Zwierlein
Chairperson
Amah/Mutsun Tribal Ban
PO Box 62-558
Woodside, CA 94062

Dear Irene:

Subject: San Francisco Public Utilities Commission – San Francisco Electric Reliability
Project Application for Certification to the California Energy Commission

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Douglas M. Davy, Ph.D.
Consulting Archaeologist

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CH2MHILL

CH2M HILL

2485 Natomas Park Drive

Suite 600

Sacramento, CA 95833

May 27, 2005

Ella Rodriguez
PO Box 1411
Salinas, CA 93902

Dear Ella:

Subject: San Francisco Public Utilities Commission – San Francisco Electric Reliability
Project Application for Certification to the California Energy Commission

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Douglas M. Davy, Ph.D.
Consulting Archaeologist

Enclosure - Map



CH2MHILL

CH2M HILL

2485 Natomas Park Drive

Suite 600

Sacramento, CA 95833

May 27, 2005

Jakki Kehl
720 North 2nd St
Patterson, CA 95363

Dear Jakki:

Subject: San Francisco Public Utilities Commission – San Francisco Electric Reliability
Project Application for Certification to the California Energy Commission

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